

FAIR POLITICAL PRACTICES COMMISSION

428 J Street • Suite 620 • Sacramento, CA 95814-2329 (916) 322-5660 • Fax (916) 322-0886 August 4, 2010

Dr. Irv Edwards, Chairman Emergent Medical Associates REDACTED

Re: FPPC No. 08/014; Irv Edwards

Dear Dr. Edwards:

The Fair Political Practices Commission ("Commission") enforces the provisions of the Political Reform Act (the "Act") found in Government Code Section 81000, et seq. As you may be aware, the Commission received a complaint alleging that you violated the disclosure provisions of the Act by making political contributions in the name of physicians who are members of Emergent Medical Associates to the Padilla for Senate Committee even though you were the true source of the contributions. The Commission has determined that we do not have sufficient evidence to establish a violation of the Act.

The complaint alleged that contributions (totaling \$1,400) were personal contributions from you although made in the name of other individuals. If true, such action would violate disclosure provisions of the Act which require all contributions to be made under the legal name of the donor. (Section 84301.) Our investigation confirmed that the individuals identified by the Padilla for Senate Committee as contributors consented to your acting as an intermediary on their behalf in conformity with Section 84302 of the Act.

The Commission publishes forms and manuals to facilitate compliance with the provisions of the Act. If you need forms or manuals, or guidance regarding your obligations, please call the Commission's Technical Assistance Division at 1-866-275-3772. Please also visit our website at www.fppc.ca.gov.

Sincerely, REDACTED

Galena West
Senior Commission Counsel
Enforcement Division

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